

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

ELDWAYNE PARKER,

DEBTOR.

**Case No.: BK-14-13476-JDL
Chapter 13**

RESPONSE TO OBJECTION TO CLAIM BY TRUSTEE

Comes now the secured creditor, BENEFICIAL KENTUCKY INC., by their attorney, Jim Timberlake, and responds to Objection to Post-Petition Mortgage Fees, Expenses, and Charges filed by the Trustee on September 17, 2015:

1. BENEFICIAL KENTUCKY INC. is the holder of a purchase money note and mortgage on the Debtor's residence (the "Property"). The note has an outstanding balance of \$65,738.16 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. This response is to protect Creditor's rights regarding its Post-Petition Mortgage Fees, Expenses, and Charges and Creditor reserves the right to supplement this response. Counsel for BENEFICIAL KENTUCKY INC. is currently researching the items raised in the Objection.

WHEREFORE, PREMISES CONSIDERED, BENEFICIAL KENTUCKY INC. prays this Court deny the Objection; and for such further relief as this Court deems appropriate.

BENEFICIAL KENTUCKY INC.,

By: s/ Jim Timberlake
JIM TIMBERLAKE - #14945
Baer & Timberlake, P.C.
4200 Perimeter Center, Suite 100
Oklahoma City, OK 73102
Telephone: (405) 842-7722
Fax: (918) 491-5424
Attorney for Creditor

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Response with postage thereon fully prepaid to the parties listed below on October 1, 2015.

Eldwayne Parker
1408 NW 102nd St
Oklahoma City, OK 73114

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

Deborah L. Brooks
Deborah Brooks & Associates PC
5500 N Western Ave Suite 130
Oklahoma City, OK 73118

By: s/ Jim Timberlake
JIM TIMBERLAKE - #14945